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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

MARIA LUISA ESCAMILLA-LOPEZ,  
JUAN CHAVARRIA,  
CHARLES JAMES BILLINGSLEY, JR.,  
Defendants.

Case No. 2:19-CR-0231-WBS

STIPULATION AND ORDER TO VACATE  
MOTIONS HEARING

**STIPULATION**

By this stipulation, Plaintiff, the United States of America, by and through its attorney of record, Assistant U.S. Attorney David W. Spencer, and Defendants Maria Luisa Escamilla-Lopez, Juan Chavarria, and Charles James Billingsley, Jr., by and through their respective attorneys of record, hereby request to vacate the motions hearing set for February 18, 2025:

1. On August 22, 2024, based on the stipulation of the parties, the Court set this case for a jury trial on May 6, 2025, and ordered that all pretrial motions must be filed by December 3, 2024. *See* ECF 320. The Court later continued the pretrial motions deadline, briefing schedule, and hearing date based on a subsequent stipulation of the parties. *See* ECF 352. As stipulated, the Court extended the pretrial motions deadline to December 30, 2024, and set a motions hearing date of February 18, 2025, at 10:00 a.m. *See id.*

2. On January 6, 2025, seven days after the pretrial motions deadline, defendant Gomez Torres filed a motion to suppress. *See* ECF 358. Based on a stipulation between the government and Gomez Torres, the Court continued the hearing date to March 10, 2025 for Gomez Torres's motion. *See* ECF 361.
3. The February 18, 2025 motions hearing date remains on calendar for defendants Escamilla-Lopez, Chavarria, and Billingsley.
4. Defendants Escamilla-Lopez, Chavarria, and Billingsley have not filed any pretrial motions.
5. The parties hereby jointly stipulate and request that the February 18, 2025 motions hearing date be vacated.

IT IS SO STIPULATED.

MICHELE BECKWITH  
Acting United States Attorney

Dated: February 10, 2025

/s/ David W. Spencer  
DAVID W. SPENCER  
Assistant U.S. Attorney

Dated: February 10, 2025

/s/ Dina Lee Santos  
DINA LEE SANTOS  
Law Offices of Dina L. Santos  
Attorney for defendant Maria Luisa Escamilla-Lopez

Dated: February 10, 2025

/s/ Clemente Jimenez  
CLEMENTE JIMENEZ  
Law Office of Clemente M. Jimenez  
Attorney for defendant Juan Chavarria


Dated: February 10, 2025

/s/ Johnny L. Griffin, III  
JOHNNY L. GRIFFIN, III  
Law Offices of Johnny L. Griffin, III  
Attorney for defendant Charles J. Billingsley, Jr.

**ORDER**

The motions hearing set for February 18, 2025, at 10:00 a.m., is hereby VACATED.

Dated: February 12, 2025

  
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WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE